

Message

From: Malone, Kathleen [Malone.Kathleen@epa.gov]
Sent: 8/19/2016 3:23:55 PM
To: Enck, Judith [Enck.Judith@epa.gov]
CC: LaPosta, Dore [LaPosta.Dore@epa.gov]; Gorman, John [Gorman.John@epa.gov]; Schulz, Susan [Schulz.Susan@epa.gov]; DeDora, Caroline [DeDora.Caroline@epa.gov]
Subject: RE: TRI question - Saint Gobain Performance Plastics facility

Judith,

Per your request, we looked at the lack of TRI reporting for the Saint-Gobain McCaffrey Street facility and find that it appears to be valid based on the available information. The TRI program reviewed the raw materials records from 2010 to 2014 that were collected as part of the Core TSCA inspections conducted at both Saint-Gobain Performance Plastic facilities in Hoosick Falls, NY in October 2015. We also spoke with a representative of Saint-Gobain. Based on this review, it appears that the McCaffrey St. facility did not need to report to TRI for those years. The only raw material used at the McCaffrey St. facility is PTFE which, as you know, is not a TRI-reportable chemical. The Liberty St. facility does report to TRI for ethylbenzene, xylene and toluene. The reason for this difference is that the facilities conduct different operations. Please see the descriptions of their operations and TRI-reported chemicals for Liberty St., below, for more detail.

1 Liberty Street operations include the manufacture of silicone rubber materials, curing, mixing of adhesives, and PTFE extrusion. Toluene is used extensively in these processes along with a product called Isopar (paraffinnic solvents) as a solvent for adhesives. These operations are contained and air emissions are vented through a filter and out a stack. Waste toluene and other chemicals from cleaning are disposed as hazardous waste.

TRI Info for Saint Gobain at 1 Liberty Street						
	Total Air Releases (pounds)			Off-Site Disposal (pounds)		
Chemical	2013	2014	2015	2013	2014	2015
Ethylbenzene	3,029	3,051	2,290	1,308	1,096	1,009
Toluene	18,241	18,014	15,142	85,000	71,888	59,195
Xylene	12,750	11,030	8,294	8,800	7,368	7,637

14 McCaffrey Street operations include skiving (thin slicing of PTFE materials which are then stretched and cut to final form), extrusion (pressing and forming of PTFE), and application of rubber pad adhesives. The PTFE is in powder form, undergoes compression and heating, and is then skived or extruded. The silicon rubber materials are brought in from the 1 Liberty Street facility, adhesive applied, and cut to shape. There are no raw materials other than PTFE used at this facility.

If you have any more questions/concerns, feel free to call or e-mail me.

Kathleen Malone-Bogusky
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From: Enck, Judith

Sent: Thursday, August 11, 2016 12:34 PM

To: LaPosta, Dore <LaPosta.Dore@epa.gov>; Malone, Kathleen <Malone.Kathleen@epa.gov>; Gorman, John <Gorman.John@epa.gov>; Schulz, Susan <Schulz.Susan@epa.gov>

Cc: Simon, Paul <Simon.Paul@epa.gov>; Hauptman, Mel <Hauptman.Mel@epa.gov>; Carpenter, Angela <Carpenter.Angela@epa.gov>; Azzam, Nidal <Azzam.Nidal@epa.gov>

Subject: TRI question

Members of the public continue to ask questions about what is currently coming out of the stack at the Saint Gobain Performance Plastics facility on McCaffrey street in Hoosick falls. I asked Tom Mongelli to look at their latest tri information and was surprised to learn that they do not report to tri. Saint gobain on Liberty street in Hoosick falls reports but not on mccaffrey street. Tom checked and they are not listed as a facility that does not have to report. I understand that they would not have to report pfoa. It strikes me as very odd that they have nothing to report under TRI. DECA, could you take a close look at this non reporting and see if it's valid. Thanks, Judith